

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

JESSICA HODGES, et al.

Plaintiffs,

vs.

CHATHAM COUNTY, GEORGIA, et al.

Defendants.

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Case Number: 4:22-cv-00067-WTM-CLR

**PLAINTIFFS' RESPONSE TO DEFENDANTS' CHATHAM COUNTY,
GEORGIA, KARLOS MANNING, AND DON WHITE'S MOTION FOR
ADDITIONAL TIME TO RESPOND TO PLAINTIFFS' MOTION TO COMPEL**

Plaintiffs, by and through their attorneys, respectfully responds to Defendants Chatham County, Georgia, Don White, and Karlos Manning's ("County Defendants") motion for additional time to respond to Plaintiffs' motion to compel. Plaintiffs have no opposition and note as follows:

1. On December 14, 2022, this Court permitted Plaintiffs to file motions to compel certain Defendants, including the County Defendants, to produce documents to which Defendants claim privileges attach. *R. Doc. 71*. Defendants were ordered to respond to any motions to compel by January 27, 2023. *Id.*

2. On January 13, 2023, Plaintiffs filed their motion to compel the County Defendants. The brief and exhibits, however, were not the intended briefs due to an error by undersigned counsel.

3. On January 19, 2023, Plaintiffs filed the correct brief and exhibits, and requested that the Court permit substitution of the incorrect brief and exhibits with the correct documents. *See, e.g., R. Doc. 77* (Plaintiffs final, effective attempt to correct their error).

4. Plaintiffs' counsel did not intend to reduce the number of days the County Defendants have to respond to Plaintiffs' motion. Plaintiffs do not oppose any extension of time for any of the Defendants to file their responses in opposition to Plaintiffs' motions to compel. Specifically, Plaintiffs do not oppose the County Defendants' motion for an additional seven (7) days to respond to Plaintiffs' motion to compel.

Respectfully submitted, this 20th day of January, 2023.

/s/ David J. Utter
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served on all counsel of record and filed electronically with the Clerk of Court's CM/ECF system.

This 20th day of January, 2023.

/s/ William R. Claiborne
WILLIAM R. CLAIBORNE